

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

| | |
|---|---|
| In re: TIP TOP TUX, LLC, <i>et al.</i> Debtor. | § § CASE NO. 23-57716-jrs § Chapter 7 § § (Jointly Administered) |
|---|---|

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE OF PLEADINGS**

PLEASE TAKE NOTICE that RED Development, LLC (“RED”), by and through its counsel, Singer & Levick, P.C., files this, its *Notice of Appearance and Request for Notice and Service of Pleadings*.

Pursuant to Bankruptcy Rules 2002, 9007 and 9010, and Sections 102(1), 342, and 1109(b) of the BANKRUPTCY CODE, RED respectfully requests that all notices given or required to be given in these proceedings and all papers served or required to be served in these proceedings be served upon its counsel at the address, telephone number and email address listed below.

Michelle E. Shriro, Esq.
Singer & Levick, P.C.
16200 Addison Road, Suite 140
Addison, Texas 75001
Phone: 972.380.5533
Fax: 972.380.5748
Email: mshriro@singerlevick.com

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109 (b) of the BANKRUPTCY CODE, the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, Orders and notices of any Application, Motion, Petition, pleading, request, complaint, or demand, whether formal or

informal, whether written or oral, whether transmitted or conveyed by mail, delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Notice and Service of Pleadings* is without prejudice to: (1) RED's rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtor and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoff and recoupments are expressly reserved, and (2) any objection which may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit RED to the jurisdiction of the Court.

DATED: September 3, 2023

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/ Michelle E. Shriro
Michelle E. Shriro
Texas State Bar No. 18310900

16200 Addison Road, Suite 140
Addison, Texas 75001
Phone: 972.380.5533
Fax: 972.380.5748
Email: mshriro@singerlevick.com

ATTORNEYS FOR:
RED DEVELOPMENT, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, which includes the parties listed below, on this 3rd day of September, 2023.

| | |
|---|---|
| <u>DEBTORS:</u> Tip Top Tux, LLC, <i>et al.</i> 500 Floyd Blvd. Sioux City, IA 51101 VIA ECF Noticing through their counsel | <u>COUNSEL FOR DEBTORS:</u> Willaim A. Rountree Rountree Leitman Klein & Geer, LLC 2987 Clairmont Road, Suite 350 Atlanta, GA 30329 VIA ECF Noticing |
| <u>TRUSTEE:</u> Jason L. Pettie Taylor English Duma 1600 Parkwood Circle, SE, Suite 200 Atlanta, GA 30339 VIA ECF Noticing | <u>US TRUSTEE:</u> Office of the US Trustee 75 Ted Turner Drive, SW, Room 362 Atlanta, GA 30303 VIA ECF Noticing |

/s/ Michelle E. Shriro
Michelle E. Shriro